

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WI-LAN INC.,

Plaintiff,

v.

LG ELECTRONICS, INC. and LG
ELECTRONICS U.S.A., INC.,

Defendants.

No. 10-CV-432 (LAK)(AJP)

**NOTICE OF PLAINTIFF WI-LAN INC.'S OBJECTION PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 72(a)**

PLEASE TAKE NOTICE that, upon the Declaration of Matthew C. Holohan dated January 12, 2011, the exhibits thereto, the accompanying Memorandum of Law, and upon all pleadings and proceedings previously had herein, the undersigned, counsel for Plaintiff Wi-LAN Inc., will move this Court, located in Room 12D of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order:

1. Reversing the January 3, 2011 Order of Magistrate Judge Peck barring Wi-LAN counsel Richard Meyer from access to material designated CONFIDENTIAL ATTORNEYS' EYES ONLY or CONFIDENTIAL –OUTSIDE ATTORNEYS' EYES ONLY – SOURCE CODE;
2. Reversing the December 30, 2010 bench ruling of Magistrate Judge Peck holding that the document Bates stamped WL0426961 through WL0426963 and the document Bates stamped WL0426964 through WL0426965 are admissible; and

3. Granting such other and further relief as the Court deems just and proper.

DATED: January 12, 2011

Respectfully submitted,

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/s/ Matthew C. Holohan

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